

EXHIBIT B

RUTH V. BRIGGS

Page 1

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

- - -

RUTH V. BRIGGS,	:	No. 16-cv-00248
Plaintiff	:	
	:	
vs.	:	
	:	
TEMPLE UNIVERSITY,	:	
Defendant	:	

- - -

Thursday, May 25, 2017

- - -

Videotaped deposition of RUTH V. BRIGGS, taken pursuant to notice, was held at the offices of Littler Mendelson, Three Parkway, 1601 Cherry Street, Suite 1400, Philadelphia, Pennsylvania 19102, beginning at 10:07 a.m., on the above date, before DEBRA ANNE GERSTEMEIER, Registered Professional Reporter and Notary Public of the Commonwealth of Pennsylvania.

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17 ALSO PRESENT:

18 Fay R. Trachtenberg - Temple counsel

19 Keith Weidenauer & Rick Christian - Videographers

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1 you can. We don't want you
2 guessing.

3 THE WITNESS: It would be a
4 guess.

5 BY MS. FENDELL-SATINSKY:

6 Q. Did you apply for more than five jobs
7 in 2010 internally at Temple?

8 A. I would say, yes.

9 Q. More than ten?

10 A. I can't say for sure.

11 Q. So somewhere between five and ten?

12 A. Yes.

13 MR. MUNSHI: Just objection to
14 form. She said she couldn't say.

15 BY MS. FENDELL-SATINSKY:

16 Q. Did you interview for any of the jobs
17 you applied for in 2010?

18 A. No.

19 Q. Who is Andrew DiMeo?

20 A. He was, when I was there, Andrew was
21 the assistant director of finance, I believe
22 is his title, in the College of Science and
23 Technology dean's office.

24 Q. Did you interact with him during your

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1 employment at Temple?

2 A. Yes, I did.

3 Q. And what did you think of him?

4 MR. MUNSHI: Just objection to
5 form.

6 You can answer if you
7 understand.

8 THE WITNESS: Uhm, I thought
9 he was a nice young man initially.

10 BY MS. FENDELL-SATINSKY:

11 Q. Anything else?

12 A. Say the question again.

13 Q. Sure.

14 I asked you what did you think of
15 Mr. DiMeo, and you testified that you
16 thought he was a nice young man initially.

17 A. Right.

18 Q. Did you have any other thoughts
19 about --

20 A. I did.

21 Q. -- Mr. DiMeo?

22 A. I did.

23 Q. And what were those or what are
24 those?

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1 THE WITNESS: Those are --

2 BY MS. FENDELL-SATINSKY:

3 Q. In asking your thoughts about him,
4 you testified that your relationship with
5 Mr. DiMeo at some point became confrontive;
6 is that correct?

7 A. Yes, it did.

8 Q. And so I asked you what did you mean
9 by confrontive.

10 A. Uhm, I distrusted him.

11 Q. Why?

12 A. Because I -- he wasn't advocating for
13 me.

14 Q. Any other reason you distrusted him?

15 A. He lied about me.

16 Q. Any other reason you distrusted him?

17 A. He, he allowed Dr. Wu to yell at me
18 in front of him, and I wanted him to stand
19 up for me.

20 Q. Any other reasons that you found
21 Mr. DiMeo -- that you distrusted Mr. DiMeo?

22 A. Honestly, yes. I, I thought because
23 he reported to Greg Wacker, who was the
24 director of finance in the dean's office,

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1 that --

2 Q. So -- I'm sorry.

3 MR. MUNSHI: She's still --

4 BY MS. FENDELL-SATINSKY:

5 Q. Go ahead.

6 A. That he was just there for Greg. You
7 know, he was just Greg's message. It didn't
8 seem like his message.

9 Q. And that made you distrust him?

10 A. Yes.

11 Q. Any other reasons that you distrusted
12 him?

13 A. No.

14 Q. You said at some point that you --
15 that your relationship became confrontive.

16 A. Yes.

17 Q. Which you've described confrontive as
18 distrusting, correct?

19 A. Yes.

20 Q. When did that happen?

21 A. Approximately 2012 to '13, around
22 that time period when he was told that he
23 would sit in on Dr. Wu's and my morning
24 meetings.

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1 A. No, he did not say that.

2 Q. How old is Mr. DiMeo?

3 A. I'm going to guess. I'm going to
4 say --

5 Q. I don't want you to guess, but if you
6 have --

7 A. I don't know.

8 Q. -- an estimate, that's fine.

9 A. 40 years old.

10 Q. So Mr. DiMeo is younger than you,
11 right?

12 A. Yes.

13 Q. Did you view him as being younger
14 than you?

15 A. No.

16 MR. MUNSHI: Just objection to
17 form.

18 BY MS. FENDELL-SATINSKY:

19 Q. Did you view Mr. DiMeo as having less
20 experience than you?

21 A. No.

22 Q. Did you value Mr. DiMeo's input into
23 your meetings with Dr. Wu?

24 A. Initially, yes.

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1 Q. And did that change at some point?

2 A. Yes.

3 Q. When did that change?

4 A. When he agreed with Dr. Wu.

5 Q. When was that?

6 A. Just about every morning. I don't
7 know. Yeah, I don't know. Often,
8 frequently.

9 Q. So am I correct that when Mr. DiMeo
10 agreed with Dr. Wu you did not value that
11 input?

12 A. I did not value, value it. No, I did
13 not.

14 Q. But you did value his input when he
15 didn't agree with Dr. Wu?

16 A. It was -- yeah, I did value him, but
17 it wasn't about that meeting. When I first
18 met him, I liked him; he was a great guy,
19 you know.

20 Q. So you said that your valuing of
21 Dr. -- of Mr. DiMeo changed when he agreed
22 with Dr. Wu, correct?

23 A. It -- can I -- that's wrong.

24 Q. Okay.

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1 A. It --

2 Q. So what did -- so when did your
3 valuing of Mr. DiMeo change?

4 A. When he was assigned to attend those
5 morning meetings. Within, I'd say, a month
6 or so.

7 Q. And what happened in a month or so
8 that made you change your valuation of
9 Mr. DiMeo?

10 A. They lied about me. I was written
11 up, disciplined.

12 Q. Were you disciplined by Mr. DiMeo?

13 A. No. By proxy.

14 Q. Mr. DiMeo never signed any of your
15 discipline, correct?

16 A. I can't say for sure if he did. I
17 think it was Greg Wacker most of the time.

18 Q. Mr. DiMeo was not somebody you
19 reported to, correct?

20 A. I report -- no. No, I did not.

21 Q. Did you find Mr. DiMeo's input to you
22 helpful?

23 A. Initially, yes.

24 Q. And then when did that change?

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1 THE WITNESS: Uhm, I was
2 afraid of him.

3 BY MS. FENDELL-SATINSKY:

4 Q. Throughout your employment at Temple?

5 A. Yes.

6 Q. Why?

7 A. He asked me to do things that were, I
8 felt, morally objectionable, if not illegal.

9 Q. What did he ask you to do that you
10 found morally objectionable, if not illegal?

11 A. The first thing he asked me to do was
12 to find something on an employee in our
13 office to get rid of her, that he didn't
14 believe she had -- she had gotten family
15 medical leave, intermittent leave, uhm, that
16 she was faking it.

17 Q. And who was that employee?

18 A. Her name is Tanya. And I'm going to
19 have to guess the spelling on her last name,
20 Andrzejewski. Her married name is Hunnewell,
21 but at the time it -- A-N-D -- I, I don't
22 know.

23 Q. What else did Mr. Wacker ask you to
24 do that you viewed as morally objectionable,

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1 if not illegal?

2 A. He coached me before we met with an
3 attorney about her lawsuit against Temple.

4 Q. When was that?

5 A. That would have been 2004.

6 Q. And that was related to Tanya
7 Hunnewell?

8 A. Yes, it was.

9 Q. What else did Mr. Wacker ask you to
10 do that you found morally objectionable, if
11 not illegal?

12 A. To call her doctor's office.

13 Q. To call Tanya Hunnewell's doctor's
14 office?

15 A. Yes.

16 Q. Was that also around 2005?

17 A. 2004 or '05, yeah.

18 Q. Why don't you give me a list of
19 everything that you found that Mr. Wacker
20 asked you to do that you found morally
21 objectionable, if not illegal.

22 MR. MUNSHI: Beyond what she's
23 already said, or recap?

24

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1 BY MS. FENDELL-SATINSKY:

2 Q. Beyond what you've already told me.

3 A. To just that -- to do what people
4 tell me to do, that my superiors tell me to
5 do even if I struggle with, struggle with it
6 morally, ethically.

7 Q. Anything else?

8 A. No.

9 Q. So there are four things you told me
10 that Dr. -- that Mr. Wacker asked you to do
11 that you found morally objectionable, if not
12 illegal, correct?

13 A. Correct.

14 Q. Is there anything in addition to
15 those four things that you've already
16 testified about that Mr. Wacker asked you to
17 do that you found morally objectionable, if
18 not illegal?

19 A. Other than what -- yes.

20 Q. What else?

21 A. Judy Lennon, who was our department
22 secretary, he told me that they were trying
23 to find something on her to get rid of her
24 and that if he caught me helping her again

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1 that he would discipline me.

2 Q. Did Ms. Lennon struggle with some of
3 her job responsibilities?

4 A. With her computer skills.

5 Q. And did you help her with her
6 computer skills?

7 A. I did.

8 Q. Uhm, and did you understand that when
9 you helped her with her computer skills
10 Mr. Wacker couldn't assess what Ms. Lennon's
11 skills were?

12 A. He didn't -- he wasn't the one who
13 assessed her.

14 Q. Who did assess her?

15 A. Dr. Wu.

16 Q. When you helped Ms. Lennon with her
17 computer skills, did you understand that
18 Dr. Wu could not assess Ms. Lennon's
19 computer skills?

20 A. Please read the question again.

21 Q. Sure.

22 MS. FENDELL-SATINSKY: Could
23 you read it back, please.

24 THE COURT REPORTER: Uh-huh.

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1 MS. FENDELL-SATINSKY: Thank
2 you.

3 - - -

4 (Whereupon, the court reporter
5 read the last question.)

6 - - -

7 THE WITNESS: No, I did not.

8 BY MS. FENDELL-SATINSKY:

9 Q. So if you help somebody with their
10 computer skills, then it's part -- their
11 performance of their computer skills is part
12 you, correct?

13 A. Yes.

14 Q. So it's not -- so when you helped
15 Ms. Lennon with her computer skills, that
16 was not adequately displaying her
17 performance, correct?

18 A. Yes.

19 Q. And if somebody is not adequately
20 displaying their own personal performance,
21 then they can't be properly assessed, right?

22 A. Yes.

23 Q. Any other things that Mr. Wacker
24 asked you to do that you found morally

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1 A. No.

2 MR. MUNSHI: We've been going
3 about an hour. Can we take five?

4 MS. FENDELL-SATINSKY: I just
5 want to finish this line of
6 questioning.

7 MR. MUNSHI: Okay. Yeah,
8 whenever you're done with this line
9 of questions.

10 BY MS. FENDELL-SATINSKY:

11 Q. The incident involving Keya where you
12 say Keya asked you for information and
13 Mr. Wacker told you not to give it to him,
14 when did that occur?

15 A. Right after his appointment as acting
16 dean. So, the date is not clear to me. I'm
17 thinking it's probably July, the summer of
18 2003-'04.

19 Q. That did not happen in 2013?

20 A. With Keya?

21 Q. Yes.

22 A. No, uh-uh.

23 Q. What did Mr. Wacker ask you to do in
24 regards to calling Tanya Hunnewell's

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1 doctor's office in 2005?

2 A. If she -- she was out, had called
3 out, and he wanted her doctor to say that
4 she was sick.

5 Q. Did you call her doctor's office?

6 A. No, I did not.

7 Q. Did he ask you to call her doctor's
8 office?

9 A. He did.

10 Q. And in 2005 Mr. Wacker was senior to
11 you, correct?

12 A. Yes.

13 MR. MUNSHI: Just objection to
14 form.

15 THE WITNESS: Yeah, yes.

16 BY MS. FENDELL-SATINSKY:

17 Q. Do you understand what -- when I say
18 the word "senior," what do you mean? What
19 did you understand that to mean?

20 A. It means that his grade level is
21 higher than me and he was also the, you
22 know, the director of finance in the college
23 dean's office.

24 Q. So Mr. Wacker asked you to call

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1 Ms. Hunnewell's doctor, and you did not do
2 that, correct?

3 A. No, I did not.

4 Q. And by not doing that, you didn't
5 listen to a direction he gave you, correct?

6 A. That is true, yes.

7 Q. You said Mr. Wacker told you to do
8 what your superiors tell you to do even if
9 you struggle morally or ethically with it?

10 A. That -- not then. Later.

11 Q. When did he tell you that?

12 A. With Dr. Wu. That would have been
13 2000 -- like 2009 to my termination.

14 Q. Did he tell you that in regard to a
15 specific incident or did he make the
16 statement generally?

17 A. It was a specific incident, but I
18 can't -- it would have been something I
19 questioned about.

20 Q. What was the specific incident?

21 A. It would have been about reporting,
22 you know, the grant numbers and what I could
23 do with them.

24 Q. You said it would have been.

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1 Q. Did you have anyone else who reported
2 to you during the time you worked at Temple?

3 A. Not direct report, no.

4 Q. Do you know how old Mr. Wacker is?

5 A. No, I do not.

6 Q. Do you have an estimate of how old he
7 is?

8 A. 55, maybe.

9 Q. At some point, you asked Mr. Wacker
10 to serve as a reference for you, correct?

11 A. I did not.

12 Q. You don't believe you ever asked
13 Mr. Wacker to serve as a reference for you?

14 A. I don't recall doing that.

15 Q. You started working at Temple in
16 February 2001 --

17 A. That is --

18 Q. -- is that right?

19 A. Yes.

20 Q. And you stopped working at Temple on
21 April 1st, 2014?

22 A. Yes.

23 Q. At the time your employment at Temple
24 ended, how much did you earn?

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1 Q. And in some instances the next step
2 of the discipline process could be
3 termination?

4 A. Could you repeat that?

5 Q. Sure. The next step in the
6 discipline process in some instances could
7 be termination?

8 A. Yes, I did know that.

9 Q. What was your first job at Temple?

10 A. I was the editorial assistant to
11 Kamel Khalili in the Center for
12 Neurovirology and Cancer Biology.

13 Q. What was your pay in that job?

14 A. I believe it was 34,000.

15 Q. Who was your supervisor?

16 A. Kamel Khalili, K-A-M, as in Mary,
17 E-L. Last name is K-H-A-L-I-L-I.

18 Q. Does Mr. Khalili --

19 A. Doctor.

20 Q. Dr. Khalili, does Dr. Khalili still
21 work at Temple?

22 A. Yes, he does.

23 Q. What did you think of Dr. Khalili as
24 a supervisor?

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1 - - -

2 (Whereupon, the court reporter
3 read back the last question.)

4 - - -

5 THE WITNESS: Uh, no.

6 BY MS. FENDELL-SATINSKY:

7 Q. And going back to something you told
8 me earlier, you mentioned an experience when
9 Dr. Khalili asked you about going to the
10 restroom and why you were not at your desk,
11 correct?

12 A. Where I had been, yes.

13 Q. Do you know if he asked anyone else
14 why they left their desk and went to the
15 bathroom or where they had been?

16 A. No, I don't.

17 Q. After your job as editorial
18 assistant, did you have another job at
19 Temple?

20 A. Yes.

21 Q. What was your next job?

22 A. Executive assistant to the dean in
23 the College of Science and Technology.

24 Q. When did you obtain that role?

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1 A. It was 2002.

2 Q. Did you apply for that job?

3 A. Yes, I did.

4 Q. And you were selected?

5 A. Yes.

6 Q. Did you want that job?

7 A. Yes.

8 Q. Why did you want that job?

9 A. Because I was told by the development
10 director that I would be helping him more
11 than anyone. And my background is in
12 development and fundraising; I was excited
13 about that.

14 Q. Who was the development director?

15 A. His name was Gregory Murphy, and he
16 was the director of development for the
17 College of Science and Technology.

18 Q. But when you applied for the role of
19 executive assistant, you understood that you
20 would be reporting to the dean; is that
21 right?

22 A. Yes. But he was part of the, the
23 group that interviewed me.

24 Q. But you understood when you applied

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1 for the job that you would not be reporting
2 to Mr. Murphy, correct?

3 A. Supervisor. I understood that, yes.

4 MR. MUNSHI: You can put that
5 to the side.

6 THE WITNESS: I don't know
7 what this is.

8 MR. MUNSHI: You can put it to
9 the side. It's okay. She'll tell
10 you if you --

11 THE WITNESS: Okay.

12 BY MS. FENDELL-SATINSKY:

13 Q. Did your salary change when you
14 became an executive assistant?

15 A. Yes, it did.

16 Q. And what did -- how did your pay
17 change?

18 A. It went -- I'm thinking around 40,
19 maybe a little less.

20 Q. Did you have additional
21 responsibilities as executive assistant that
22 you had not had as an editorial assistant?

23 A. Oh, yes.

24 Q. And who was the dean of the College

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1 of Science and Technology at that time?

2 A. Allen Nicholson.

3 Q. Had you worked with Dean Nicholson in
4 your role as an editorial assistant?

5 A. No.

6 Q. What did you think of Dean Nicholson?

7 MR. MUNSHI: Objection to
8 form.

9 THE WITNESS: Very fine --

10 MR. MUNSHI: Go ahead.

11 THE WITNESS: Very -- a fine
12 man, very -- a good man. I really
13 liked Dr. Nicholson.

14 BY MS. FENDELL-SATINSKY:

15 Q. Did you like him as a supervisor?

16 A. Yes.

17 Q. Did you think he was a fair
18 supervisor?

19 A. Yes.

20 THE COURT REPORTER: D-2.

21 MR. MUNSHI: Thank you.

22 - - -

23 (Whereupon, 2/14/05 Temple HR
24 Affirmative Action Authorization,

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1 Bates No. TEMPLE0078-80, was marked
2 as D Exhibit No. 2 for
3 identification.)

4 - - -

5 BY MS. FENDELL-SATINSKY:

6 Q. The court reporter has given you a
7 document that was marked as D-2.

8 A. Uh-huh.

9 Q. Same first question; I'm going to ask
10 whether you've seen this document before.

11 A. No, I have not. I don't --

12 MR. MUNSHI: Take your time.

13 THE WITNESS: No, I have not.

14 BY MS. FENDELL-SATINSKY:

15 Q. On the first page, it says the date
16 this was issued was February 14th, 2005.

17 Do you see that?

18 A. I see that.

19 Q. Does that refresh your recollection
20 about when you started as the executive
21 assistant to Dean Nicholson?

22 A. 2005, this says? Is that what --

23 Q. That's what it says.

24 A. Yeah, okay. Yeah, okay.

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1 Q. So I'm asking: Does that refresh
2 your recollection as to when you --

3 A. Yes.

4 Q. -- started working in that role?

5 A. Yes.

6 Q. So do you believe you started working
7 for Dean Nicholson in 2005?

8 A. Yes.

9 Q. And it says recommended starting
10 salary \$45,500.

11 Do you see that?

12 A. I see that.

13 Q. Does that refresh your recollection
14 about what your salary was when you were --
15 started as the executive assistant for
16 Dean Nicholson?

17 A. I don't remember it now, but I see
18 it, yeah.

19 Q. Do you have any reason to doubt
20 that's what your salary was when you
21 started --

22 A. I have no reason --

23 Q. -- reporting to Dean Nicholson?

24 A. No, I don't doubt it.

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1 Q. Who booked Dean Nicholson's travel?

2 A. I don't know. He wasn't there -- he
3 was only there for the first two months or
4 three months I was there.

5 Q. Dean Nicholson was?

6 A. Yes.

7 Q. And then what happened to him?

8 A. He was replaced with Keya Sadeghipour
9 as the acting dean. I believe it was July
10 1st is the -- yeah.

11 Q. July 1st of 2005?

12 A. Yes.

13 Q. Do you know why Dean Nicholson was
14 replaced by Keya Sadeghipour?

15 A. No, I do not.

16 Q. And when Dean Nicholson was replaced
17 by Mr. Sadeghipour -- Dr. Sadeghipour, did
18 you keep your position as executive
19 assistant?

20 A. Yes.

21 Q. Had you worked with Mr. Sadeghipour
22 prior to 2005?

23 A. No.

24 Q. So you had no interactions with

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1 anything about the medical information.

2 A. I didn't ask. Yeah.

3 Q. So you don't know what Tanya's
4 medical information said about when she was
5 entitled to leave, correct?

6 A. No, I don't. You're right.

7 Q. Going back to your work for Dean
8 Sadeghipour, how long did Dean Sadeghipour
9 stay in the role as the dean of College of
10 Science and Technology?

11 A. About 18 months. And I'm
12 approximating.

13 Q. After about 18 months, did someone
14 else become the dean of the College of
15 Science and Technology?

16 A. Yes.

17 Q. Who was that?

18 A. That was Hai-Lung, H-A-I, hyphen,
19 L-U-N-G. Last name is Dai, D-A-I.

20 Q. And when Dean Dai became the dean,
21 did you stay in your role as executive
22 assistant?

23 A. Yes.

24 Q. Did you have the same

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1 him.

2 BY MS. FENDELL-SATINSKY:

3 Q. Did you think he was fair?

4 A. Uh-huh.

5 Q. Is that a "yes"?

6 A. Yes. I'm sorry.

7 Q. What did you think of Dean Dai?

8 MR. MUNSHI: Same objection to
9 form.

10 You can answer.

11 THE WITNESS: I welcomed
12 Dean Dai with open arms. I was so
13 happy to see him. I could see the
14 dean's office was really going to
15 take off instead of just sort of
16 limping along. And I was very
17 excited, and I felt we had a really
18 good relationship initially.

19 BY MS. FENDELL-SATINSKY:

20 Q. And did that change at some point?

21 A. Uhm, towards the end, yes.

22 Q. And why did it change?

23 A. Because I was, because I was told I
24 was on loan to Dr. Wu in the other

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1 department. And that was all I knew, just
2 to help him get off. He was a new chair.

3 Q. Were you upset that Dean Dai had put
4 you on loan to Dr. Wu?

5 A. No, not at all. It was just that I
6 was forgotten.

7 Q. By who?

8 A. The dean's office.

9 Q. And by Dean Dai?

10 A. Dean Dai and Vice-Dean George
11 Palladino.

12 Q. In what way do you believe you were
13 forgotten?

14 A. Because I was told I was on loan,
15 and, like, you know, a year-and-a-half
16 passed. I'm like, When am I coming back?
17 But then I reported directly to Palladino at
18 that point.

19 Q. When did you start reporting to
20 Palladino?

21 A. When Dean Dai was appointed dean, the
22 permanent dean.

23 Q. When did that happen?

24 A. Oh, that happened -- once again,

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1 year, I'm going to say he started January
2 1st of 2006 or '07. That was his official
3 date.

4 Q. And at that point in time,
5 Vice-Dean Palladino became your supervisor?

6 A. Well, Vice-Dean was there before
7 Dean Dai. He came in during the transition.

8 Q. Right. But did you start to report
9 to Vice-Dean Palladino in January 2006 or
10 2007?

11 A. Before. When Dr. Palladino came
12 over, I'm guessing, the fall before. When
13 he came over, I reported to him because
14 Dean Dai wasn't here -- there.

15 Q. And you did not report to -- was
16 there a time when there was no dean?

17 A. There were acting deans.

18 Q. Right. So, I understand Dean
19 Sadeghipour was an acting dean.

20 And he was there about 18 months, you
21 told me?

22 A. Yes.

23 Q. And then you told me after Dean
24 Sadeghipour, Dean Dai became the dean?

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1 did you continue to report to Dr. --

2 A. I continued --

3 Q. -- Palladino?

4 A. -- to report to Palladino.

5 Q. Let me finish my questions.

6 A. I'm sorry.

7 Q. That's okay.

8 What did you think of Dean Palladino
9 as a supervisor?

10 A. He was a tough guy, but I liked him.

11 Q. Did you think --

12 A. He was -- go ahead.

13 Q. I'm sorry. Go ahead. It sounded
14 like you were going to say something else.

15 A. Yeah, yeah. I just thought he was a
16 good guy.

17 Q. Did you think he was fair?

18 A. He was fair.

19 Q. When did you -- when were you, what
20 you said, given on loan to Dr. Wu?

21 A. That would have been the end of
22 August/beginning of September of 2009.

23 Q. At that point in time, did Dean Wu
24 become your supervisor?

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1 A. Yes.

2 Q. And you said after about a
3 year-and-a-half in that role you wanted to
4 go -- well, let me ask you: Did there come
5 a point in time when you understood that you
6 were going to be Dr. Wu's executive
7 assistant?

8 A. Well, temporarily, immediately when
9 he asked.

10 Q. Okay. Well, did there come a point
11 in time when you understood that was going
12 to be your permanent position?

13 A. Not officially, no.

14 Q. So no one ever told you that your
15 role was to be Dr. Wu's executive assistant;
16 is that your testimony?

17 A. That is.

18 Q. So the whole time that you worked for
19 Dr. Wu, you believed that you were on loan
20 to him?

21 A. For the first 18 months, I did, yeah.

22 Q. And then what did you believe after
23 the first 18 months?

24 A. I felt forgotten.

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1 Q. Okay. So did you believe that you
2 were on loan after the first 18 months?

3 A. No, I did not anymore.

4 Q. So what did you believe then after
5 the first 18 months?

6 A. That I was there, I was -- it was
7 permanent.

8 Q. So that you were going to be Dr. Wu's
9 permanent executive assistant?

10 A. Right, exactly.

11 Q. As Dr. Wu's executive assistant, did
12 you have the same kinds of responsibilities
13 you had had for Dean Nicholson --

14 A. Yes.

15 Q. -- Dr. Palladino, and Dean --

16 A. Sadeghipour.

17 Q. -- Sadeghipour?

18 MR. MUNSHI: Objection to
19 form.

20 Go ahead and answer.

21 THE WITNESS: Yes.

22 BY MS. FENDELL-SATINSKY:

23 Q. So you were responsible for Dr. Wu's
24 travel?

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1 distinguished guest from another university
2 come in.

3 Q. Did that change your responsibilities
4 or did it just make the events themselves
5 different?

6 A. Just different, just different.

7 Q. So it did not change your
8 responsibilities in regard to organizing the
9 events?

10 A. No.

11 Q. And in your role as executive
12 assistant for Dr. Wu, you didn't have any
13 responsibility for staff supervision --

14 A. No.

15 Q. -- correct?

16 A. No, I did not.

17 Q. Were you the only executive assistant
18 for Dr. Wu?

19 A. Yes.

20 Q. So Dr. Wu did not have any other
21 executive assistants while you were his
22 executive assistant?

23 A. That is correct.

24 Q. Did anyone else report to Dr. Wu

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1 description.

2 A. Dependability; clear communication --
3 they're all. Problem-solving;
4 decision-making; and team work is always
5 important. Yeah.

6 Q. As Dr. Wu's executive assistant, you
7 had a lot of responsibility?

8 A. I did.

9 Q. Uhm, and a lot of different kinds of
10 responsibilities?

11 A. Yes.

12 Q. And you understood that your job was
13 essential to Dr. Wu's job?

14 A. Yes, I did.

15 Q. And Dr. Wu, was he a busy person?

16 A. Very busy.

17 Q. He had a busy schedule?

18 A. Very busy.

19 Q. So it was very important to manage
20 his schedule correctly, right?

21 A. Yes.

22 Q. And that was part of your
23 responsibility?

24 A. That was part, yes.

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1 Q. And since Dr. Wu was a busy person,
2 it was also important for you to keep him
3 organized, correct?

4 A. Yes.

5 Q. And that was one of your
6 responsibilities, right?

7 A. Yes.

8 Q. And if Dr. Wu was more organized, he
9 could be more effective, did you feel?

10 A. Yes.

11 Q. And if he was more effective, did you
12 feel that would reflect well on both of you?

13 A. Yes.

14 Q. Where did you physically work when
15 you worked for Dr. Wu?

16 A. Two different places. Initially, I
17 worked outside of his office on the third
18 floor in Walkman Hall.

19 Q. Did you work physically somewhere
20 else?

21 A. Yes.

22 Q. Where was that?

23 A. Uhm, it was Thanks -- the night
24 before Thanksgiving of, let me see, 2007, I

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1 MS. FENDELL-SATINSKY: Yup.
2 I'll just ask a couple more
3 questions.

4 MR. MUNSHI: Sure.

5 MS. FENDELL-SATINSKY: And
6 then we'll take a break.

7 THE WITNESS: Yeah. It
8 doesn't feel finished yet. Okay.

9 BY MS. FENDELL-SATINSKY:

10 Q. Are you okay to keep going for a --

11 A. Yeah.

12 Q. -- few more minutes?

13 A. Uh-huh.

14 Q. Uhm, did you view Dr. Wu as having an
15 important job?

16 A. Yes.

17 Q. And did you feel that you were
18 important, your role was important to him?

19 A. Yes, I did.

20 - - -

21 (Whereupon, 12/31/12 email re
22 Happy New Year, Bates No. TEMPLE
23 UNIVERSITY (R.BRIGGS)-000363-368 AND
24 362, was marked as D Exhibit No. 4

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1 Q. So you don't recall exchanging
2 holiday or New Year's wishes with Dr. Wu
3 other than this D-4?

4 A. I'm not sure.

5 - - -

6 (Whereupon, Temple University
7 Rules of Conduct, Bates No.
8 TEMPLE0148-164, was marked as D
9 Exhibit No. 5 for identification.)

10 - - -

11 BY MS. FENDELL-SATINSKY:

12 Q. Ms. Briggs, the court reporter has
13 given you a document that's been marked as
14 D-5. I'm going to have the same first
15 question for you, which is whether you've
16 ever seen this document before.

17 A. Yes, I have.

18 Q. And is this Temple University's Rules
19 of Conduct?

20 A. Yes, it is.

21 Q. Did you have access to this during
22 your employment at Temple?

23 A. Yes, I did.

24 Q. I'd like you to turn to TEMPLE0152.

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1 A. (Witness complies with request.)

2 Okay.

3 Q. So the top of this page says, "Rules
4 of Conduct," and then the second sentence
5 says, "Temple expects its employees to abide
6 by the following Rules of Conduct."

7 Do you see that?

8 A. Uh-huh.

9 Q. Is that a "yes"?

10 A. Yes. I'm sorry.

11 Q. That's okay.

12 Did you understand that Temple
13 expected its employees, including you, to
14 abide by the bullet-pointed Rules of Conduct
15 listed on TEMPLE0152?

16 A. Yes.

17 Q. If you go down to the bottom, it says
18 "Disciplinary Procedure."

19 A. Uh-huh.

20 Q. Do you see that?

21 A. Yes, I do.

22 Q. And I'm going to the last para -- the
23 last sentence of this paragraph. It says,
24 "Repeated violations of work rules within a

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1 specific category over a 12-month period
2 will lead to the next step in the
3 progressive discipline process."

4 Do you see that?

5 A. Yes, I do.

6 Q. Do you understand that?

7 A. Yes, I do.

8 Q. And did you understand that during
9 your -- the time you worked at Temple?

10 A. I understood that it was a
11 possibility, yes.

12 Q. Well, did you understand that
13 violations of work rules within a specific
14 category over a 12-month period would lead
15 to the next step in the progressive
16 discipline process?

17 A. I didn't understand it to be true all
18 the time, to be honest with you.

19 Q. You told me earlier that you were on
20 probation in 2012 and 2013 and 2014,
21 correct?

22 A. That is correct.

23 Q. And why did you believe that you were
24 on probation those years? I apologize if I

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1 A. I did know that it was a policy, yes.

2 - - -

3 (Whereupon, Temple University
4 Polices and Procedures Manual memo,
5 Bates No. BRIGGS 94-96, was marked
6 as D Exhibit No. 6 for
7 identification.)

8 - - -

9 THE WITNESS: There's nothing
10 more with this (indicating)?

11 MS. FENDELL-SATINSKY: Not
12 right now.

13 THE WITNESS: Okay.

14 MS. FENDELL-SATINSKY: You can
15 put it to the side.

16 BY MS. FENDELL-SATINSKY:

17 Q. The court reporter has given you a
18 document that's been marked as D-6.

19 A. Uh-huh.

20 Q. Is that a "yes"?

21 A. Yes. I'm sorry. "Yes."

22 Q. That's okay.

23 Same first question to you is whether
24 you've seen this document before.

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1 A. Yes, I have.

2 Q. And if you look down at the Bates
3 numbers in right-hand corner, you see it
4 says "BRIGGS 94" on the first page?

5 A. Yes, I do.

6 Q. And I will tell you that means that
7 this is a document that you or your attorney
8 produced to us from you. Okay?

9 A. Yes.

10 Q. Did you have access to this document
11 throughout your employment at Temple?

12 A. Yes.

13 Q. And did you understand this document
14 during your employment at Temple?

15 A. Yes.

16 Q. And you understand that Temple
17 prohibits discrimination and harassment,
18 correct?

19 A. Yes.

20 MR. MUNSHI: Objection to
21 form.

22 Go ahead.

23 BY MS. FENDELL-SATINSKY:

24 Q. You understood that was Temple's

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1 policy during your employment, correct?

2 A. Yes.

3 Q. I want to go back quickly to earlier
4 we talked about Mr. Wacker.

5 A. The --

6 Q. You can put that aside --

7 A. Oh, okay.

8 Q. -- for now.

9 A. Okay, okay.

10 Q. And when we talked about Dr.

11 Wacker --

12 A. Mr. Wacker.

13 Q. Mr. Wacker. I'm giving everybody
14 additional titles or not enough titles.

15 When we talked about Mr. Wacker, you
16 gave me a list of things that Dr. Wacker
17 asked you to do that you found morally
18 objectionable, if not illegal.

19 Do you remember that?

20 A. Yes.

21 Q. Why do you think Dr. -- let me ask it
22 again.

23 Why do you think Mr. Wacker asked you
24 to do those things you identified as morally

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1 objectionable, if not illegal?

2 MR. MUNSHI: Objection to
3 form.

4 BY MS. FENDELL-SATINSKY:

5 Q. Do you understand my question?

6 A. Yes, I do.

7 Q. Okay.

8 A. Uhm, I was surprised that he asked me
9 to do it. It was against the law.

10 Q. Why do you --

11 A. And it --

12 Q. Why do you think he asked you to do
13 it?

14 A. Because he told me he did not believe
15 that Tanya was sick.

16 Q. Why do you believe that he did not
17 believe Tanya was sick?

18 A. I don't know.

19 Q. Why do you believe he told you to
20 find something on Tanya to get rid of her?

21 A. Because he thought she was lying.

22 Q. Why do you believe he coached you
23 before your meeting with an attorney about
24 Tanya's lawsuit?

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1 discriminated against you because of your
2 age and your sex, and you said Dr. Wu.

3 A. Specifically, yes.

4 Q. Okay. Anyone else aside from Dr. Wu?

5 A. No.

6 Q. Your Complaint also alleges that
7 Temple subjected you to a hostile work
8 environment --

9 A. Yes.

10 Q. -- correct?

11 A. Yes. That is the true.

12 Q. Who do you believe created a hostile
13 work environment?

14 A. Greg Wacker; Drew DiMeo; Dr. Wu.

15 Q. And how do you believe Mr. Wacker
16 created a hostile work environment?

17 A. By threatening me if I didn't
18 cooperate with him that he would fire me.

19 Q. When did he do that?

20 A. It was about Judy, helping Judy out.

21 Q. Did he ever threaten you on any other
22 occasion?

23 A. My first day in the dean's office,
24 but that's a long time ago.

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1 Q. And the first day in the dean's
2 office, was that when you worked for Dean
3 Nicholson?

4 A. Yes, uh-huh.

5 Q. And what did he threaten you with in
6 regards to that occasion?

7 A. He stood over my desk when everyone
8 was gone and told me that I probably
9 shouldn't mess with him, because I wouldn't
10 win. And I said to him, "I won't."

11 Q. Any other way that you believe
12 Mr. Wacker created a hostile work
13 environment for you?

14 A. By not responding to my, my requests
15 for help, mediation, something between
16 Dr. Wu and myself.

17 Q. Did he assign, uhm, Drew DiMeo to
18 that role?

19 A. It wasn't happen -- yes, he did,
20 but...

21 Q. So he did respond to your request,
22 just not in a way that you were satisfied
23 with?

24 A. I didn't request Drew to be in on the

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1 Q. And why do you think Mr. Wacker
2 singled you out?

3 A. I don't know the answer to that
4 question.

5 Q. Uhm, any other way in which you
6 believe Mr. Wacker created a hostile work
7 environment for you?

8 A. By, uhm, reporting -- having Drew,
9 his, his report, sit in our meetings and
10 then report back to him. He always knew
11 what happened.

12 Q. Any other way in which you believe
13 Dr. Wacker created a hostile work
14 environment for you?

15 A. He just -- he would call me and say,
16 "I just want you to just do whatever he
17 says. I'm tired of him coming over here,"
18 those kind of things. It just was I felt
19 stressed all the time.

20 Q. Do whatever who says?

21 A. Dr. Wu.

22 Q. Okay. And anything else that
23 Dr. Wacker did that you believe created a
24 hostile work environment for you?

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1 A. By being involved. I don't know why
2 he was involved in my -- I wasn't in his
3 office. I don't know what his involvement
4 was.

5 I mean when I was with Dr. Wu. Prior
6 to that, I was in his office.

7 Q. Okay. Anything else?

8 A. Fear. I saw what happened, what he
9 wanted me to do to one person, another
10 person, and I was, I was fearful that it
11 would happen to me.

12 Q. So you were fearful that he would
13 want to do what?

14 A. To find a reason to get -- you know,
15 to, to discipline me.

16 Q. Why did you think he wanted to
17 discipline you?

18 A. I don't know.

19 Q. Anything else Mr. Wacker did that you
20 thought created a hostile work environment?

21 A. Yeah. He and Dr. Wu would meet
22 behind my -- you know, without me.

23 Q. Okay. Anything else?

24 A. Not that I can -- no.

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1 A. I don't know the answer to that
2 question.

3 Q. Okay. You also told me that you
4 believe Drew DiMeo subjected you to a
5 hostile work environment, correct?

6 A. Yes.

7 Q. What did Drew DiMeo do that you
8 believe made a hostile work environment?

9 A. He -- in our morning meetings, it was
10 really he and Dr. Wu. And this was three
11 days a week they would meet with me and
12 just -- it wasn't about what we're going to
13 do. It's going to be "what did you do
14 wrong." And Greg, I never would have, you
15 know, a chance to defend, to say "that's not
16 true" or...

17 Drew, I felt like Drew was my friend
18 for a while, and -- and that changed.

19 Q. And so when that changed, did you
20 feel at that point that he started to create
21 a hostile work environment for you?

22 A. The hostile work environment created
23 started when he was asked to sit in on the
24 meetings with Dr. Wu and I in the morning

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1 but under Greg Well's -- Greg Wacker's
2 supervision.

3 Q. And other than the mornings meetings
4 with Mr. DiMeo, did Mr. DiMeo do anything
5 else that you believe created a hostile work
6 environment for you?

7 A. Yes. His -- he was unwilling to
8 believe me or trust me.

9 Q. Anything else?

10 A. No.

11 Q. Why do you believe that Mr. DiMeo was
12 asked to sit in on your morning meetings
13 with Dr. Wu?

14 A. I don't know.

15 Q. Why do you believe Mr. DiMeo was
16 unwilling to believe or trust you?

17 A. I don't know.

18 Q. You also said that Dr. Wu created a
19 hostile work environment for you; is that
20 correct?

21 A. Yes, he did, uh-huh.

22 Q. Yes?

23 A. Yes, he did.

24 Q. Okay. What did Dr. Wu do that

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1 A. Correct.

2 Q. So I want to know what Dr. Wu did
3 that created a hostile work environment for
4 you?

5 A. He would, he would degrade, yell at
6 me, I mean literally yell at me in public
7 settings - front office, elevator, hallway -
8 in front of external constituents, staff,
9 other faculty.

10 Q. Would it be accurate to say that
11 Dr. Wu was a yeller?

12 A. Yes.

13 Q. And so he yelled at a lot of people,
14 right?

15 A. Not -- no.

16 Q. Did you ever see him yell at
17 students?

18 A. His graduate students I did, yes.

19 Q. Did you ever see him yell at any
20 other employees?

21 A. No, I did not.

22 Q. What else did Dr. Wu do that made you
23 feel that you were subjected to a hostile
24 work environment?

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1 A. He thought -- he said. He would
2 often say, "Are you stupid or something?"
3 You know, it was degrading.

4 He would criticize my, my finances.
5 I mean, just really weird stuff that was...

6 Q. So I want to know everything that he
7 did that you believe contributed to a
8 hostile work environment for you, and I --
9 you've given me a couple things already, so
10 I want to know if there's anything else.

11 A. No. Just generalized fear.

12 Q. Why do you believe Dr. Wu yelled at
13 you?

14 A. I don't know.

15 Q. Well, why do you believe Dr. Wu said
16 you were stupid?

17 A. I don't know.

18 Q. Why do you believe Dr. Wu criticized
19 your finances?

20 A. I don't know.

21 Q. The final claim in your Complaint is
22 that Temple retaliated against you because
23 of internal reports of discrimination you
24 made, correct?

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1 wasn't available.

2 Q. And did Dr. Wu have a voicemail on
3 his phone?

4 A. It was always full.

5 Q. Was that part of your responsibility,
6 to check his voicemails?

7 A. No, it was not.

8 Q. Did he ever ask you to do that?

9 A. No, he did not.

10 Q. Did you ever offer to do that?

11 A. No. He really used his cell phone,
12 so...

13 Q. Did you have Dr. Wu's cell phone
14 number?

15 A. His number, yes, uh-huh.

16 Q. Do you know if his cell phone had a
17 voicemail?

18 A. I don't know. I'm assuming.

19 Q. And there were instances in which you
20 were late, correct?

21 A. Yes.

22 Q. And was Dr. Wu generally flexible
23 about that?

24 A. Until, yeah, until one time he

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1 wasn't.

2 Q. And when was that one time?

3 A. The time I overslept three hours.

4 And I don't -- the date would have been
5 probably 2014.

6 Q. And what happened on the occasion on
7 which you overslept for three hours?

8 A. I woke up, had a "Home Alone" moment,
9 called work, and asked for Dr. Wu. He was
10 in a meeting. I asked for Judy. They
11 didn't know where she was, so I told the
12 student worker who was answering the phones.
13 I said, "Please tell Dr. Wu I'm" -- and I
14 live within five minutes of the University.
15 "I'm coming right now. I overslept."

16 Q. Did you call Dr. Wu's cell phone that
17 day?

18 A. No. She said he was in a meeting.

19 Q. My question was: Did you call his
20 cell phone?

21 A. No, I did not, no.

22 Q. Did you email him that day?

23 A. No, I did not.

24 Q. Did you ever text message with Dr. Wu

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1 on his personal cell phone?

2 A. Probably, yeah.

3 Q. Did you send him a text message on
4 that day?

5 A. No, I did not.

6 Q. And do you -- how late were you when
7 you --

8 A. I was three hours late.

9 MR. MUNSHI: Just wait until
10 the question is done.

11 THE WITNESS: Okay. I'm
12 sorry.

13 MR. MUNSHI: That's okay.

14 BY MS. FENDELL-SATINSKY:

15 Q. So you were three hours late --

16 A. Uh-huh.

17 Q. -- on that occasion?

18 A. Yes, I was.

19 Q. And -- strike that.

20 A. I'm sorry?

21 Q. I just said "strike that."

22 A. Oh, okay.

23 Q. Yup. And you didn't call in that
24 lateness until you were three hours late,

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1 correct?

2 A. I, I woke up. Yeah, right.

3 Q. But by the time you'd woke up, you
4 were three hours late?

5 A. Yes, yes.

6 Q. But other than that particular
7 occasion, Dr. Wu was flexible with you being
8 late?

9 A. Generally, in the department. I
10 wasn't late that often.

11 Q. Were -- was there any other time in
12 which you were three hours late --

13 A. Never.

14 Q. -- without notifying?
15 Was there any other time when you
16 were more than two hours late without
17 notifying him?

18 A. No.

19 Q. Was there any other time in which you
20 were an hour late notifying him?

21 A. No.

22 Q. Was there any time in which you were
23 more than 30 minutes late without notifying
24 him?

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1 A. No.

2 Q. Was there ever a time in which you
3 were more than 15 minutes late without
4 notifying him?

5 A. Not that I recall.

6 Q. Was there ever a time that you were
7 more than ten minutes late without notifying
8 him?

9 A. I think maybe I could have been.

10 Q. Sometimes did you leave during the
11 day to run errands?

12 A. No.

13 Q. You never left for errands?

14 A. For him maybe.

15 Q. You never left to run a personal
16 errand yourself?

17 A. At lunchtime.

18 Q. Did you ever leave anytime other than
19 lunchtime to run a personal errand for
20 yourself?

21 A. Can you give me -- like a doctor's
22 appointment? I don't know what you mean.

23 Q. So I'm asking if you recall any time
24 that you left during the day to run an

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1 A. I'm sorry. I didn't hear the last
2 thing you said.

3 Q. I said I don't have any other --

4 A. Oh, okay.

5 Q. -- questions --

6 A. Oh, okay.

7 Q. -- about that document at this time.

8 - - -

9 (Whereupon, 11/09/11
10 Disciplinary Report, Bates No.
11 BRIGGS 23, was marked as D Exhibit
12 No. 9 for identification.)

13 - - -

14 BY MS. FENDELL-SATINSKY:

15 Q. Ms. Briggs, the court reporter has
16 given you an exhibit that's marked as D-9.

17 A. Uh-huh.

18 Q. Take a look at the exhibit, and my
19 first question to you is going to be whether
20 you've ever seen this before.

21 A. Yes, I have.

22 Q. And is this the disciplinary report
23 from Dr. Wu to you on November -- in
24 November 2011?

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1 A. That is correct.

2 Q. And if you look down at the Bates
3 number in the bottom right-hand corner of
4 this document, it says "BRIGGS 23."

5 Do you see that?

6 A. Yes, I do.

7 Q. And that means that's a document that
8 your attorney provided to us.

9 A. Okay.

10 Q. So you received a copy of this
11 document, correct?

12 A. Yes.

13 Q. And it says it's a written warning;
14 is that right?

15 A. Yes, it does.

16 Q. And it was for a violation of Rule
17 B.11, unprofessional/inappropriate conduct,
18 correct?

19 A. That is correct.

20 Q. What led to this disciplinary report?

21 A. Uhm, Dr. Wu was standing in front of
22 my desk, and it was -- actually, it was the
23 day after my birthday, and, uhm, he asked me
24 how old I turned. And I guess I was 58 or

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1 something. He said, uh, "You know, in China
2 women are put out to pasture by your age."

3 And he made a similar comment before,
4 and I just said, "Well, with all due
5 respect, we are in America right now."

6 And then the next thing I knew, I got
7 called to the dean's office and I was
8 written up for unprofessional conduct. And
9 I asked Greg if he knew what Dr. Wu had said
10 to me. He didn't know.

11 Q. If you look down at the bottom of the
12 document where it says "print name," is that
13 your signature?

14 A. That's my signature.

15 Q. And then below that there's another
16 signature.

17 Do you know whose that is?

18 A. That's Dr. Wu's.

19 Q. And was this presented to you by
20 Dr. Wack -- by Mr. Wacker and Dr. Wu?

21 A. You know, I don't recall who
22 report -- I don't recall if it was just him
23 or Greg was there. I don't know.

24 Q. What occurred at the meeting during

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1 which this was given to you?

2 A. I do remember. I went to -- Greg
3 called me to his office and gave it to me
4 for unprofessional conduct, yeah.

5 Q. So was Dr. Wu not present?

6 A. No, he wasn't there, no.

7 Q. And what did Greg tell you when he
8 gave this to you?

9 A. He said, "Dr. Wu just said that you
10 had been inappropriate in public," he said,
11 "Something that was" -- you know, I
12 shouldn't said.

13 And I said, "Did he tell you what I
14 said?" And I repeated it back. I said, "He
15 said something about my age, and I said,
16 'Well, we're not there. We're in America
17 now.'"

18 Q. Did Greg tell you anything else about
19 why you received this discipline?

20 A. No, he did not.

21 Q. Did you ask him anything else about
22 why you received this discipline?

23 A. No, I did not.

24 Q. Did you ask Dr. Wu why you received

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1 this discipline?

2 A. No, I did not.

3 Q. When you told Dr. Wu that, what you
4 said was, "We're in America now" or "We're
5 in America," what was his response?

6 A. Nothing. I mean, it didn't seem
7 unusual. He just walked away. I mean, it
8 wasn't like he was upset about it or
9 anything. He just walked away.

10 Q. And you said he had made that comment
11 previously?

12 A. Yes.

13 Q. When did he make that comment
14 previously to you?

15 A. With, you know, within a period of
16 four or five months, he would make reference
17 to -- it usually had to do with my age and
18 my salary. I mean, I would talk to him
19 about that. And then I don't know how it
20 got onto that women being put out to pasture
21 at 55. I'm like...

22 Q. So, my question is a little
23 different.

24 When did he -- was there another

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1 occasion on which he said to you that women
2 are put out to pasture by that age?

3 A. Well, he didn't use that term, but he
4 did say something about women in China are
5 required to retire earlier. He didn't use
6 the get out -- you know, "put out to
7 pasture" thing.

8 Q. Retire earlier than what?

9 A. At 55, he told me.

10 Q. So on another occasion Dr. Wu told
11 you women in China retire at 55?

12 A. Yes.

13 Q. And when was that?

14 A. Around the same, you know, very close
15 to the same time.

16 Q. Where were you when he said that?

17 A. We were in his office.

18 Q. Was the door shut?

19 A. I don't recall.

20 Q. Did anyone else sit close to Dr. Wu's
21 office?

22 A. It was pretty open. Yeah, yeah; the
23 student workers and Judy.

24 Q. What was the conversation you were

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1 having with Dr. Wu in which he allegedly
2 told you that women in China retire at 55?

3 A. It was about my, uhm -- he was
4 telling me that I should, I should go -- I
5 should travel, and I said, "Well, I really
6 don't have the money to travel."

7 And he said, "Well, you must be a
8 poor money manager. I know how much money
9 you're making."

10 I was like, "Dr. Wu, I'm a single
11 mother. I can't go." And I said, "Plus, I
12 have a job. I just can't drop my job and
13 go."

14 That was, you know -- it -- I
15 don't -- I can't say that he said that women
16 were -- I should retire, but the implication
17 was "it's time for you to travel and get out
18 of here."

19 Q. So --

20 A. And it was -- and then this happened
21 a couple weeks later.

22 Q. So he didn't actually say women in
23 China retire --

24 A. No, but he did question me.

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1 certain age anytime other than the day on
2 which Mr. Wacker gave you this discipline,
3 and you told me "no."

4 A. Not that terminology, right.

5 Q. Right. And so I asked you -- you
6 told me -- I asked you what else did he say
7 sort of in that vein, and you told me that
8 he told you that women in China retire at 55
9 and that he said that during a conversation
10 in which he was telling you that you should
11 travel.

12 A. Okay. Well, let me rephrase that.
13 Okay?

14 Q. Sure.

15 A. That I am, that I -- what I took from
16 that was that he was telling me that I
17 needed to travel and I needed to be a better
18 money manager and travel; there's no reason
19 I can't. "You've been" -- I'm a single
20 mother, "go." So I, I read into that.

21 Q. Okay. So Dr. Wu did not actually
22 tell you that you should retire?

23 A. No.

24 Q. Correct?

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1 A. He told me -- no, he did not tell me
2 to retire.

3 Q. You interpreted from what he was
4 saying you felt that he was saying that you
5 should retire?

6 A. Yes.

7 Q. Was it in that conversation when he
8 told you women in China retire at 55?

9 A. No. That was this day (indicating).
10 No, it wasn't.

11 Q. Okay. So the women -- so was that
12 the same comment as "women are put out to
13 pasture" by that age? I'm just confused.

14 A. Yeah, I am too now, when which
15 happened and in what order.

16 Q. So I'm not concerned about the order
17 right now. I understand your testimony that
18 on the day that you received this
19 disciplinary report, you're saying that
20 Dr. Wu told you that women are put out to
21 pasture by a certain age in China.

22 A. Right.

23 Q. I understand that.

24 A. Okay.

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1 Q. So then I asked you if he ever said
2 that again, and you said "no," correct?

3 A. "Put out to pasture"?

4 Q. Yes.

5 A. No.

6 Q. That was your testimony.

7 A. No, he didn't.

8 Q. He never said that again?

9 A. No, he did not say that.

10 Q. And then I asked you if he made
11 comments that were similar, and you said
12 that he told you that women in China retire
13 at 55; so I want to know what conversation
14 you had with him during which he told you
15 that women in China retire at 55.

16 A. With, with absolute certainty, I
17 can't give you the date or the exact
18 wordage, but I know that it happened before
19 this. That's why I lost it. Well, not lost
20 it, but I -- I'm not generally one to be
21 confrontive, but I just said, "We're not in
22 China."

23 Q. In what context did that conversation
24 occur?

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1 A. No, I don't remember calling and
2 telling him.

3 Q. We talked about earlier one of your
4 responsibilities was to book Dr. Wu's
5 travel.

6 A. Yes.

7 Q. Correct?

8 A. Yes.

9 Q. And we also talked about earlier the
10 importance of booking travel correctly for
11 him, right?

12 A. Yes.

13 MR. MUNSHI: You can put the
14 document to the side.

15 THE WITNESS: Okay. Is this
16 over?

17 MR. MUNSHI: Just listen to
18 the question.

19 THE WITNESS: Okay.

20 MR. MUNSHI: The questions
21 that she has.

22 BY MS. FENDELL-SATINSKY:

23 Q. I think I may have just asked this,
24 but I apologize because --

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1 A. Okay.

2 Q. -- Mr. Munshi's comment threw me off.

3 You told me you understood the
4 importance --

5 A. Yes.

6 Q. -- of making correct travel
7 arrangements?

8 A. I do.

9 - - -

10 (Whereupon, 8/2/12 email
11 string, Bates No. TEMPLE UNIVERSITY
12 (R.BRIGGS)-0000150-155, was marked
13 as D Exhibit No. 11 for
14 identification.)

15 - - -

16 BY MS. FENDELL-SATINSKY:

17 Q. Ms. Briggs, the court reporter has
18 given you a document that's been marked as
19 D-11. I'm going to ask you to review this
20 and let me know if you've seen it before.

21 A. (Witness complies with request.)

22 Okay.

23 Q. Have you seen this document before?

24 A. Yes.

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1 Q. Starting on the first page of this
2 document, looking at the second email, it's
3 an email from August 1st, 2012 from Dr. Wu
4 to you.

5 A. Uh-huh.

6 Q. Do you see that?

7 A. I do.

8 Q. And in the email he asks you to check
9 a direct flight from Philly to Napa or
10 nearby, leaving Monday afternoon and coming
11 back on Thursday morning.

12 Do you see that?

13 A. Uh-huh.

14 Q. Is that a "yes"?

15 A. I see it, yes. I'm sorry.

16 Q. That's okay.

17 A. Uh-huh.

18 Q. And did you book that flight for
19 Dr. Wu?

20 A. I'm -- yes. I, I -- yes.

21 Q. Did you book the flight on an
22 incorrect date?

23 A. It says I purchased it on Monday.
24 I'm not going to argue with that, but...

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1 Q. So the email that's above the email
2 we just discussed is an email from Dr. Wu to
3 Justin Shi and Drew DiMeo saying that you
4 stated "clearly leaving on Monday," but you,
5 Ruth, changed it to Sunday and purchased it
6 without his knowledge.

7 Do you know what Dr. Wu is referring
8 to?

9 A. Uhm, I don't recall.

10 Q. Did you -- was there an occasion, any
11 occasion on which you incorrectly booked
12 flights for Dr. Wu?

13 A. Not to my knowledge.

14 Q. So you --

15 A. Not without being directed, no.

16 Q. So you don't recall any occasion on
17 which you booked incorrect travel for
18 Dr. Wu?

19 A. No, I don't.

20 MR. MUNSHI: You can put that
21 to the side. Just wait for her
22 question.

23 THE WITNESS: Oh, I wanted to
24 make sure I know what it's about.

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1 MR. MUNSHI: Just listen to
2 the question.

3 BY MS. FENDELL-SATINSKY:

4 Q. You told me earlier that when you
5 started working for Dr. Wu that Dr. Wu was
6 more focused on events with speakers and
7 visiting speakers.

8 A. Yes.

9 Q. Is that correct?

10 A. He had an emphasis on it, yes,
11 absolutely.

12 Q. And was Dr. Wu involved with
13 recruiting faculty from -- recruiting
14 faculty?

15 A. Faculty internally for Temple?

16 Q. Yes.

17 A. He was part of it. Yes, he was part
18 of it.

19 Q. And did you assist him in helping
20 coordinate --

21 A. Yes.

22 Q. -- the logistics --

23 A. Yes.

24 Q. Let me finish my question.

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1 A. Uh-huh.

2 Q. Did you assist him in coordinating
3 logistics for faculty when they came to
4 interview at Temple?

5 A. Candidates, right?

6 Q. Candidates.

7 A. Yes.

8 Q. Yes.

9 So faculty from other universities or
10 schools that came to interview --

11 A. Right.

12 Q. -- at Temple, correct?

13 A. That is correct.

14 Q. And when you had candidates come
15 visit, it was important to ensure they had
16 the best visit possible, right?

17 A. Yes.

18 Q. Because if they were a candidate it
19 was somebody that Temple potentially wanted
20 to hire, right?

21 A. That is correct.

22 Q. And were you responsible for, in some
23 occasions, in booking travel for candidates
24 when they came to visit?

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1 A. The tenured faculty, yes.

2 Q. And you told me before you understood
3 the importance of booking correct travel,
4 right?

5 A. Absolutely.

6 Q. And that would hold true for
7 candidates visiting as well?

8 A. Yes.

9 Q. While working under Dr. Wu, was there
10 an instance in which you forgot to book
11 plane reservations for a visiting candidate?

12 A. Well, I didn't forget, but Clint
13 Whaley, yes, his ticket was not purchased.

14 Q. And you said you didn't forget.
15 What do you mean?

16 A. He and I were -- Clint Whaley and I
17 were going back and forth. I'd get him an
18 itinerary, and he'd say it's not working,
19 try another one, and it just went back and
20 forth and...

21 Q. Let me show you an email maybe to
22 refresh your recollection.

23 A. I'm the one who admitted that I
24 didn't.

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1 And as soon as I realized it was
2 Clint Whaley, I went right in and told
3 Dr. Wu.

4 Q. So Dr. -- is it your testimony that
5 because Dr. Wu asked you to work on another
6 project you did not follow up with
7 Dr. Whaley?

8 A. Yes.

9 Q. And I believe you testified to this
10 before, but ultimately you did take
11 responsibility for not booking Dr. Whaley's
12 travel, correct?

13 A. At the end, yes. At the end, it
14 falls on me.

15 Q. You recognized --

16 A. I dropped the ball.

17 Q. So you recognized that --

18 A. Yes.

19 Q. -- you did not complete something
20 that you were supposed to?

21 A. Yes, I do.

22 Q. And you understood that not booking
23 his travel was problematic; is that correct?

24 A. Oh, absolutely.

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1 Q. Did Dr. Whaley ultimately come visit
2 Temple?

3 A. No, he did not.

4 Q. And was that because his travel was
5 not booked? If you know.

6 A. I don't know.

7 Q. And was Dr. Whaley hired by Temple?

8 A. No.

9 Q. And to become hired by Temple, in
10 your experience, does the person have to
11 interview in-person?

12 A. This is -- yes. Several. You know,
13 there's a process.

14 Q. And to be hired as a faculty at
15 Temple, in your experience, the person must
16 interview several times in-person?

17 A. Yes.

18 Q. So because Dr. Whaley did not
19 actually visit, he could not have been hired
20 for the position?

21 A. That is correct.

22 Q. And were you disciplined for this?

23 A. Three days suspension without pay.

24 - - -

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1 (Whereupon, 3/26/13
2 Disciplinary Report, Bates No.
3 BRIGGS 49, was marked as D Exhibit
4 No. 13 for identification.)

5 - - -

6 BY MS. FENDELL-SATINSKY:

7 Q. Ms. Briggs, my first question to you
8 is going to be whether you're seen this
9 document before.

10 A. Yes, I have.

11 Q. And is this the discipline you
12 received as a result of the incident with
13 Dr. Whaley you just testified about?

14 A. Yes, I -- yes, it is.

15 Q. And where it says "employee
16 signature," is that your signature?

17 A. That is mine.

18 Q. And where it says "Ruth Briggs" in
19 the handwritten text, is that your
20 handwriting?

21 A. Yes.

22 Q. And below that it says "Jie Wu."

23 Do you recognize --

24 A. I do recog --

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1 Q. -- the signature as Dr. Wu's
2 signature?

3 A. Uh-huh.

4 Q. Is that a "yes"?

5 A. Yes, it is. I'm sorry.

6 Q. And this, uh, was a three-day
7 suspension without pay, correct?

8 A. Correct.

9 Q. And this was issued to you on March
10 26th, 2013, right?

11 A. Yes.

12 Q. In "explanation," it says, "C.4 -
13 Neglecting job duties or responsibilities or
14 failing to carry out instructions given by a
15 supervisor (sic)."

16 A. Correct.

17 Q. Do you see that?

18 A. Yes.

19 Q. And do you understand, uhm, that you
20 had committed a Level C disciplinary
21 infraction?

22 A. I disagree with the level, but, yes,
23 I do. I dropped the ball.

24 Q. So you disagreed with the severity of

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1 the discipline?

2 A. Yes.

3 Q. But you understood that you were
4 issued a Level C discipline?

5 A. Yes.

6 Q. And you understood -- you told me
7 before that you dropped the ball.

8 And in "dropping the ball," which
9 were your words, did you fail to carry out
10 an instruction given by Dr. Wu to book
11 travel for Dr. Whaley?

12 A. To complete it, yes.

13 Q. And if you need to pull it back out,
14 that's fine, but the first time that there's
15 a Level C infraction, that leads to a
16 suspension without pay, correct?

17 A. Right, correct.

18 Q. And you understood that, correct?

19 A. I didn't know that then, but I did
20 after, yeah.

21 Q. But you did have access to the Rules
22 of Conduct throughout your --

23 A. I did.

24 Q. -- employment?

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1 Q. Okay. And you said you disagreed
2 with the severity of the discipline?

3 A. Uh-huh.

4 Q. Is that a "yes"?

5 A. Yes, it is.

6 Q. Why?

7 A. Because it wasn't willful. It was a
8 mistake, and there are mitigating factors.
9 I was alone in the office. There was Judy
10 Lennon was on family medical leave because
11 her mom died. I mean, there was no one in
12 the office, and I was pulling it, so...

13 I'm not going to make excuses for
14 dropping the ball, but I -- there was a lot
15 of other things. And I -- Dr. Kwatny says
16 people in our department don't make
17 mistakes. Well, I did, and I owned up to it
18 and I took my three-day suspension.

19 Q. The, uh, the instruction to book
20 Dr. Whaley's travel, that was given solely
21 to you, correct?

22 A. I believe, yes. That's my knowledge.

23 Q. So you don't have any knowledge that
24 Ms. Lennon was involved?

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- 1 A. No, I don't have any.
- 2 Q. Or that she was asked to be involved?
- 3 A. I don't have any knowledge if she
- 4 was.
- 5 Q. And you did not ask Ms. Lennon to be
- 6 involved, correct?
- 7 A. No, I didn't, no.
- 8 Q. No, you did not ask her --
- 9 A. I did not --
- 10 Q. -- to be involved?
- 11 A. -- ask her, no.
- 12 Q. Why did you feel -- let me step back.
- 13 I understand from what you've told me
- 14 that you disagreed with the severity of the
- 15 discipline, correct?
- 16 A. Correct.
- 17 Q. Although you disagreed with it, did
- 18 you understand why it had been a Level C
- 19 infraction?
- 20 A. Yes, I did.
- 21 Q. And although you disagreed with it,
- 22 did you understand Dr. Wu's position about
- 23 why it was a Level C infraction?
- 24 A. No.

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1 Q. Okay. And why do you think Dr. Wu
2 gave you a Level C infraction?

3 A. I believe he wanted me out of there.

4 Q. Why?

5 A. He didn't like me. Not that he
6 didn't like me personally. He didn't want
7 me to -- he wanted a secretary, basically,
8 and he didn't -- what Justin Shi, who is
9 that associate chair, told me is that "Dr.
10 Wu doesn't want you to ask questions. He
11 doesn't want you to make suggestions. He
12 just wants you to listen to him and do what
13 he says."

14 Q. Why do you believe that Dr. Wu,
15 uhm -- you said, you said that Dr. Wu -- you
16 don't believe Dr. Wu didn't like you; is
17 that right?

18 A. He didn't want me where I was, right.

19 Q. So why do you believe that?

20 A. I don't know. I don't know. I don't
21 know. I, I do believe Dr. Wu liked me, and
22 I liked him, you know, when things were
23 good.

24 Q. So --

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1 A. I can tell you what I think --

2 Q. Sure.

3 A. -- is the reason. Well, being in
4 another building doesn't help. Uhm, getting
5 emails like "do this," "do" -- I mean, it
6 was not clear, and then it would change and
7 then it would be he'd, you know, change it,
8 "Judy, you do it." It just flipped around
9 all the time.

10 And I was always called off of
11 something I was doing without -- oh, I
12 always went, "I'll do it. I'll do it."

13 Q. Did he -- is he somebody who has high
14 demands of people who work for him?

15 A. Uhm, yes, he does. His faculty. Not
16 all staff, but his faculty.

17 Q. And he -- is it fair to say he
18 expects a lot of his employees?

19 A. Some, yeah.

20 Q. Uhm, and you say "some."

21 Does he not expect --

22 A. He protected some.

23 Q. -- a lot from other employees?

24 A. Yeah, yeah. He protected some

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1 people.

2 Q. So who did he protect?

3 A. He protected Judy from -- and I
4 wanted to -- myself, I didn't want to see
5 Judy lose her job either.

6 Q. Why do you feel he protected Judy?

7 A. Because he just -- you know, he
8 allowed her, he -- I kept saying, "Dr. Wu,
9 she needs training. She needs to go to
10 computer classes."

11 Q. And in what way did he protect her?

12 A. He said, "I think the computer" --
13 "the typewriter is cute."

14 Q. And --

15 A. "Cute" is the word he used.

16 Q. Do you know how long Judy worked for
17 Dr. Wu?

18 A. Well, Dr. Wu -- she's been in that
19 department for, I -- you know, from high
20 school or Temple from high school; so she
21 just recently retired, I guess. But I don't
22 know. I mean, the whole -- she was there
23 when he came in. So when he was recruited
24 by Dr. Dai, who I was part of, you know,

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1 doing his travel, he, uhm -- she was already
2 there.

3 Q. So Judy --

4 A. So he inherited her.

5 Q. Okay. So Judy was with Dr. Wu from
6 the start of Dr. Wu's employment --

7 A. Yes.

8 Q. -- at Temple?

9 A. Yes.

10 Q. And anyone else that you felt Dr. Wu
11 protected other than Judy?

12 A. When Alexandra Grinshpun was there.
13 It wasn't protection. It was just not --
14 letting stuff slide, but yelling at me all
15 the time about that.

16 Q. So your opinion was that he let stuff
17 slide for Judy and Alexandra but not for
18 you?

19 A. Right.

20 Q. And how old is Judy?

21 A. Oh, geeze. She's older than me. I
22 would say she's 65, maybe.

23 Q. And how old was Alexandra?

24 A. Forty-ish. She had small children,

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1 so I'm just guessing.

2 Q. And let me correct that both Judy and
3 Alexandra are both women?

4 A. Yes.

5 Q. Anyone else that you felt Dr. Wu
6 protected?

7 A. Jackie Harriz; Hailey King; Laurie
8 Shteir.

9 Q. Anyone else?

10 A. Tom Stauffer. I mean, there was some
11 pretty serious mistakes no one ever got in
12 trouble for, and that's why I was surprised.

13 Q. Are you aware of anyone else who
14 worked in Dr. Wu's office who failed to book
15 travel arrangements for a visiting
16 candidate?

17 A. No, I am not aware of anyone.

18 Q. How old is Jackie Harriz?

19 A. Well, she retired from Temple, so I'm
20 guessing. I don't know, 60-ish, 65.

21 Q. How old is Hailey King?

22 A. In her late 20s, early 30s.

23 Q. How old was Laurie Shteir?

24 A. Fifty-ish.

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1 Q. How old was Tom Stauffer?

2 A. Forty-ish.

3 Q. Anyone else that you felt Dr. Wu
4 tried to protect?

5 A. Not that comes to mind, no.

6 Q. You said that, uhm -- Dr. Gi (sic),
7 is that correct, the assistant chair?

8 A. (No response.)

9 Q. You said that --

10 MR. MUNSHI: Shi?

11 THE WITNESS: Shi?

12 MS. FENDELL-SATINSKY: Shi.

13 THE WITNESS: Oh, Dr., yeah,
14 Justin Shi, yeah.

15 MS. FENDELL-SATINSKY: Thank
16 you.

17 THE WITNESS: Uh-huh.

18 BY MS. FENDELL-SATINSKY:

19 Q. You said that Dr. Shi told you that
20 Dr. Wu wanted a secretary?

21 A. No. He said, "He just wants you to
22 not give feedback, not make suggestions.
23 Don't ask any questions. Just do as he
24 says." So if I ask him to clarify

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1 something, that was challenging him.
2 Q. Did you ask Dr. Shi for input or did
3 Dr. --
4 A. I did. I did.
5 MR. MUNSHI: Just wait until
6 she's done --
7 THE WITNESS: I'm sorry.
8 MR. MUNSHI: -- asking the
9 question.
10 BY MS. FENDELL-SATINSKY:
11 Q. So you asked Dr. Shi for input?
12 A. Yes.
13 Q. And this is -- what you just
14 testified to is what Dr. Shi told you?
15 A. Yes.
16 Q. Do you know why Dr. Wu did not want
17 you to give feedback or make suggestions?
18 A. I don't.
19 Q. After receiving the disciplinary
20 report at D-13, did you understand that you
21 were on probation for a year and that any
22 further Level C infraction could lead to the
23 end of your employment at Temple?
24 A. Yes, I did.

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1 sending you a written --

2 A. Right.

3 Q. -- reminder of that; is that correct?

4 A. That is correct. But I didn't make
5 these charges.

6 Q. But it is accurate that you've had
7 several meetings with -- you had had several
8 meetings with Dr. Wu and Drew regarding not
9 using Dr. Wu's credit card for departmental
10 usage?

11 A. That is correct. And these were made
12 by someone else, I want you to know. His
13 card number everyone had.

14 Q. Did you monitor his credit card bills
15 as part of your job?

16 A. I did.

17 Q. And did you tell him when there were
18 charges to his credit card that shouldn't
19 appear?

20 A. I did.

21 Q. Following the suspension notice that
22 was D-13 --

23 A. D -- okay.

24 Q. -- between then and the end of your

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1 employment at Temple, did Dr. Wu and
2 Mr. DiMeo address other performance issues
3 with you?

4 A. Yes; Monday, Wednesday, and Friday
5 mornings.

6 Q. Was one of the things they spoke with
7 you about your delay in responding to
8 communications?

9 A. To, to whom?

10 Q. Sure. So you told me that Dr. Wu and
11 Mr. DiMeo spoke with you about other
12 performance issues between your suspension
13 notice and the end of your employment at
14 Temple, correct?

15 A. Yes.

16 Q. So I asked if one of the things they
17 spoke with you about was your delay in
18 responding to communications.

19 A. He did. But I didn't delay. I don't
20 believe I delayed. Five minutes I don't
21 think, is his email, is not a delay.

22 - - -

23 (Whereupon, 11/20/13 email
24 regarding another example, Bates No.

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1 want me to tell you that.

2 Rahul, I'm going to ask you --

3 THE WITNESS: Okay.

4 MS. FENDELL-SATINSKY: -- to
5 stop telling the witness that if she
6 doesn't understand the question she
7 should tell me that. I've given her
8 that instruction numerous times
9 today, and she's indicated she
10 understands that instruction.

11 MR. MUNSHI: Fine. Now you
12 remember.

13 - - -

14 (Whereupon, the court reporter
15 read back the following question:

16 Q Does seeing this exhibit at
17 D-15 refresh your recollection that
18 there were instances in which you
19 were delayed in responding to
20 communications?)

21 - - -

22 THE WITNESS: No.

23 BY MS. FENDELL-SATINSKY:

24 Q. You mentioned earlier that you had

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1 three-times-a-week meetings with Andrew
2 DiMeo and Dr. Wu; is that correct?

3 A. That is correct.

4 Q. And when did those meetings start?

5 A. I think they started probably the
6 fall of 2013.

7 Q. Did those meetings start after you
8 spoke with Mr. Wacker about needing somebody
9 or wanting somebody to help "mediate," I
10 think were your words, between you and
11 Dr. Wu?

12 A. Actually, I didn't ask Greg. I asked
13 Deirdre. But I -- these -- the meetings
14 started out more as like let's go over
15 what's going on in the department. They
16 started out as informative, no problem at
17 all.

18 So, that's not how they started out.
19 It's just the tone of them changed, the door
20 was shut, and, you know, staff are like,
21 "What's going on with Ruth?" I -- they just
22 changed in tone to be -- to being, you know,
23 confrontive. It really wasn't about what's
24 going on in the department. It's like where

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1 BY MS. FENDELL-SATINSKY:

2 Q. Did you understand that the meetings
3 were partially intended to help improve
4 communications between --

5 A. That's what I was told.

6 Q. -- you and Dr. Wu?

7 A. Yes. That's what I was told.

8 Q. And who told you that?

9 A. Greg and Drew.

10 Q. And you said during the meetings Drew
11 and Dr. Wu would discuss performance issues;
12 is that right?

13 A. Yeah.

14 Q. And did they identify performance
15 issues during the meetings?

16 A. Yeah.

17 Q. And by identifying the performance
18 issues, did you understand those were areas
19 in which they expected improvement from you?

20 A. Yes.

21 MS. FENDELL-SATINSKY: We can
22 take a quick break.

23 MR. MUNSHI: Thank you.

24 THE VIDEOGRAPHER: This

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1 BY MS. FENDELL-SATINSKY:

2 Q. Have you seen this document marked as
3 D-16 before?

4 A. Yes, I have.

5 Q. And is this a disciplinary report
6 from January 20th, 2014 from Dr. Wu to you?

7 A. Correct.

8 Q. If you look down at the bottom where
9 it says "employee signature," is that your
10 name and your signature?

11 A. That is my name, yes.

12 Q. And your signature?

13 A. Uh-huh.

14 Q. Is that a "yes"?

15 A. Yes. I'm sorry.

16 Q. And below you, is that Andrew DiMeo's
17 name and signature?

18 A. That -- uh, it is. I can't justify
19 to whether it's his, but that is what it
20 says.

21 Q. Did Mr. DiMeo meet with you to issue
22 this discipline?

23 A. I don't know, because I can't
24 remember what it was for. This -- there was

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1 in which you overslept and reported to work
2 three hours late that we have not discussed?

3 A. Could you, could you --

4 Q. Sure. So, earlier you testified
5 about an instance in which you reported to
6 work three hours late.

7 A. Right.

8 Q. Because you overslept, correct?

9 A. Correct.

10 Q. And that's what this discipline that
11 was marked as D-16 was for, correct?

12 A. Correct.

13 Q. So I was asking whether there's
14 anything related to the incident that
15 resulted in the discipline at D-16 that we
16 have not talked about.

17 A. Yes.

18 Q. What?

19 A. I was basically called a liar. No
20 one would even contact -- when they talk
21 about there being procedures and protocol,
22 there was no protocol in that department.

23 Q. Did you ever observe anyone in your
24 office reporting to work three hours late

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1 without informing somebody else in the
2 office?

3 A. I don't know if it was three hours.
4 I know someone who didn't come in for three
5 days.

6 Q. Without reporting that they --

7 A. Without reporting.

8 Q. -- were going to be out?

9 A. Yup.

10 Q. Who was that?

11 A. Hailey King.

12 Q. Do you know of the circumstances why
13 Ms. King did not report to work for three
14 days?

15 A. Well, she didn't call -- no, I don't,
16 no. Dr. Wu was traveling at the time and...

17 Q. Do you know if she had previously
18 spoken with Dr. Wu about that?

19 A. She did not.

20 Q. How do you know that?

21 A. Because Dr. Wu didn't know about it,
22 he said.

23 Q. Do you know if Ms. King was ill?

24 A. I didn't ask her. She was pretty

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1 new. I didn't ask her.

2 Q. Did you ask -- did you know if
3 Ms. King had an emergency?

4 A. I don't know.

5 Q. So you don't know why Ms. King was --
6 did not report to work for three days?

7 A. No, I don't.

8 Q. Okay. Was there anyone else who
9 reported to work three hours late and did
10 not report that they were going to be three
11 hours late?

12 A. Three hours or just --

13 Q. Yes.

14 A. -- tardiness?

15 Okay. I don't know of anyone, but
16 I'm not nosey.

17 Q. And who called you a liar?

18 A. I can't say that anybody called me a
19 liar. They said I was lying.

20 Q. About what?

21 A. About Dr. Wu's accusations.

22 Q. About what?

23 A. About all of these emails.

24 Q. Okay. So, I am focused right now --

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1 Q. Tell me about that.

2 A. I booked the reservations at Club
3 Quarters for the speaker as I was told to.
4 Dr. Wu had the date wrong.

5 Q. So was it your position that the
6 error was not your fault?

7 A. That one was not my fault.

8 Q. Did you ever fail to submit Dr. Wu's
9 expense reports in a timely manner?

10 A. No, I did not.

11 Q. Your testimony is that you always
12 submitted Dr. Wu's expense --

13 A. In a timely manner, yes.

14 Q. It's your testimony that you always
15 submitted Dr. Wu's expense reports in a
16 timely manner?

17 A. Right.

18 Q. Is that "yes"?

19 A. That is "yes."

20 Q. Is it your testimony that you always
21 submitted Dr. Wu's expense reports within
22 the time that he requested they be
23 completed?

24 A. No, I did not.

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1 Q. So there were instances in which you
2 did not complete Dr. Wu's expense reports
3 within the time Dr. Wu wanted you to
4 complete them?

5 A. That is correct.

6 Q. And we talked about earlier expense
7 reports were a part of your job
8 responsibilities in working for Dr. Wu,
9 right?

10 A. Yes. I did them.

11 Q. Just not on time.

12 A. Not in three hours, no.

13 Q. Your employment with Temple ended on
14 April 1st, 2014; is that correct?

15 A. That is correct.

16 Q. Do you recall an incident in March of
17 2014 when you were instructed to complete a
18 travel reimbursement expense for Dr. Wu by
19 the end of the day?

20 A. Not specifically, but there are
21 times, yes, uh-huh.

22 Q. Do you -- during the meetings you had
23 with Drew and Dr. Wu, did you become
24 argumentative in any of those meetings?

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1 A. In the end, I did. I hadn't -- I
2 felt -- they were lying about me, and no one
3 would listen to me. H.R. wouldn't listen to
4 me. No one would listen to me.

5 Q. What were they lying about?

6 A. Well, they were saying I didn't call
7 in on that day that I was three hours late,
8 which is not the truth. I asked them to
9 please investigate it, I'm not lying, and
10 they said they wouldn't.

11 Q. And on that day when you were three
12 hours late, you didn't call in until you
13 were three hours late, correct?

14 A. As soon as I got up. And I came to
15 work immediately. I mean, I was there to
16 work in ten minutes.

17 Q. And that was three hours after you
18 were due to report to work, correct?

19 A. Yes.

20 Q. And you did not call in until you
21 woke up, which was three hours late?

22 A. That is correct.

23 Q. Anything else that you told Drew and
24 Dr. Wu were calling you a liar about?

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1 A. Well, one of them is that they
2 wouldn't -- that I had called in. They kept
3 saying I didn't. I said, "I did call in."

4 Q. And --

5 A. And it was their word against mine.

6 Q. You said that when you called in you
7 reported it to a student worker, correct?

8 A. That's the only person who was there.

9 Q. Anything else that you felt Drew and
10 Dr. Wu were lying about with regard to you?

11 A. I don't believe that it was Drew
12 doing it intentionally to me. I will say
13 that first. But looking at these emails, I
14 don't -- I can -- him forwarding an email
15 saying I didn't complete something when he
16 didn't answer my question makes it look out
17 to me -- that is just what -- the general
18 way it went for me.

19 Q. Why did you believe Dr. Wu was
20 calling you a liar?

21 A. I really believe he just wanted me to
22 go, disappear.

23 Q. And is that because you believed that
24 he wanted you to do different tasks than you

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1 Again, for the third or fourth time,
2 my question is: Why do you believe that
3 Dr. Wu wanted you out? And, again, those
4 are your words.

5 A. I believe he wanted a younger
6 secretary that wasn't as problematic to his
7 budget, and it seemed likely that it be
8 Ruth. I was the only one who wasn't in a
9 union in the department, and I had no
10 recourse.

11 Q. So you believe that he wanted a
12 younger secretary?

13 A. He wanted a secretary, right.

14 Q. He wanted a secretary.

15 A. A secretary, yes.

16 Q. And you were not a secretary,
17 correct?

18 A. I am not a secretary.

19 Q. So you believe he wanted somebody in
20 a different role than you?

21 A. I do.

22 Q. And somebody who cost less than you
23 cost?

24 A. Yes.

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1 Q. Is there any other reasons that you
2 believed that Dr. Wu wanted you out?

3 A. No.

4 Q. Ultimately, you resigned from Temple,
5 correct?

6 A. Under duress. I was given a chance
7 to be terminated or submit my resignation.

8 Q. So you were given a choice, correct?

9 A. Yes.

10 Q. And you chose resignation, correct?

11 A. I did. And the reason is that
12 Deirdre said I could continue to bid on
13 internal jobs at Temple.

14 - - -

15 (Whereupon, 4/3/14 resignation
16 email, Bates No. TEMPLE0088, was
17 marked as D Exhibit No. 17 for
18 identification.)

19 - - -

20 THE COURT REPORTER:

21 Seventeen.

22 BY MS. FENDELL-SATINSKY:

23 Q. Ms. Briggs, have you seen this
24 document before?

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1 A. Yes.

2 Q. And is this your resignation letter?

3 A. Yes, it is.

4 Q. This is dated April 3rd, 2014,
5 correct?

6 A. That is correct.

7 Q. And it indicates that your
8 resignation is effective April 1st, 2014,
9 correct?

10 A. That is correct.

11 Q. The fact that you resigned from
12 Temple, has that enabled you to tell
13 potential employers that you resigned?

14 A. I only had two interviews since then,
15 and it came up and I said I resigned. One
16 of them was internal, and one was at the
17 Community College of Philadelphia.

18 Q. In connection with your resignation,
19 were you told that no challenges would be
20 made to your application for Unemployment
21 Compensation?

22 A. When I asked a question, yes, Deirdre
23 told me that it fell on Temple. If they say
24 that they are going to agree to it, then

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1 that's where the appeal thing starts.

2 Q. And did Deirdre tell you that no
3 challenge would be made to your request?

4 A. She did tell me that.

5 Q. And was no challenge, in fact, made?

6 A. No challenge was made, but they also
7 told me to write down that I resigned.

8 Q. Did you ultimately receive
9 Unemployment Compensation?

10 A. Uhm, after appeal.

11 Q. But you ultimately received
12 Unemployment Compensation; is that correct?

13 A. Yes; about eight weeks afterwards.

14 Q. And the Unemployment Compensation you
15 received, was that backdated? So did you
16 receive it going back --

17 A. It was back --

18 Q. -- to the time of --

19 A. Yes, it was.

20 Q. -- your resignation?

21 A. Yes, it was.

22 - - -

23 (Whereupon, 4/1/14 letter,

24 Bates No. TEMPLE0171, was marked as

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1 D Exhibit No. 18 for
2 identification.)

3 - - -

4 BY MS. FENDELL-SATINSKY:

5 Q. Ms. Briggs, I've given you a document
6 that's been marked as D-18. Again, my first
7 question to you is going to be whether
8 you've seen this document before.

9 A. Yes, I have.

10 Q. And this is a letter from Mr. Wacker
11 to you, correct?

12 A. That's correct.

13 Q. Did Mr. Wacker give you this letter
14 in-person?

15 A. Yes.

16 Q. Was there anyone else in the meeting
17 for --

18 A. Deirdre Walton.

19 Q. Let me finish my question.

20 A. I'm sorry.

21 Q. Was there anyone else in the meeting
22 with Dr. -- with Mr. Wacker when he gave you
23 D-18?

24 A. Deirdre Walton.

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1 Q. Anyone else?

2 A. No.

3 Q. Where was the meeting?

4 A. It was in the third-floor dean's
5 office conference room in Walkman Hall --
6 no. Conwell, I'm sorry, Conwell.

7 Q. What were -- were you told there was
8 a purpose to the meeting?

9 A. No. I didn't...

10 Q. And what occurred during the meeting?

11 A. I walked in the room. I didn't see
12 Deirdre immediately. I just -- Greg had
13 called me. When I came in, he said, "Look,
14 we have a meeting. Can you come down?"
15 And I was actually meeting with Sandy
16 Foehl that morning, and I didn't want to
17 cancel the meeting. And I told him I
18 couldn't be there till 10:30.

19 He said, "Well, when you get," you
20 know -- "just come to my office when you get
21 back."

22 So, I did. I'm like, "I'm back."

23 And he said, "Let's go in the
24 conference room."

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1 So I just started walking ahead of
2 him, and he was behind me. And then I heard
3 Deirdre, and I looked. I went, "This is
4 probably not an April Fools joke," but...

5 Q. And so --

6 A. But then they handed me this letter.

7 Q. Okay. And what did they tell you?

8 A. I can't -- you know what, I cannot
9 remember. I was shocked. I was in shock.

10 Q. So do you not remember any discussion
11 that occurred at that meeting?

12 A. No.

13 Q. Is it your testimony that the only
14 thing you recall about that meeting is where
15 the meeting occurred, going into the
16 meeting, receiving this letter, and who was
17 at the meeting?

18 A. Yes. I remember reading the last
19 line of the letter.

20 Q. Okay. Is there anything else about
21 the meeting in which you received D-18 that
22 you recall?

23 A. No.

24 Q. And this letter states that you were

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1 in violation of two Category C work rules,
2 correct?

3 A. Uh-huh.

4 Q. Is that a "yes"?

5 A. That is, I'm sorry, yes.

6 Q. And those violations were related to
7 incidents, the incidents referenced above in
8 the letter in bullet points, correct?

9 A. Uh-huh. That -- yes, uh-huh. Sorry.

10 Q. And you told me earlier that when you
11 received the March 2013 suspension you
12 understood that you were on probation for a
13 year, correct?

14 A. Correct.

15 Q. And you understood then that any
16 further Level C infraction could lead to the
17 end of your employment at Temple, correct?

18 A. I did know that. But, quite
19 honestly, I didn't really know it was a
20 Level C until a week later when I got my
21 stuff from the office.

22 Q. You didn't know that the March
23 2013 --

24 A. No. Because I just -- I was --

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1 Q. Earlier you identified some employees
2 that you felt Dr. Wu protected.

3 A. Uh-huh.

4 Q. Do you recall that?

5 A. Yes, I do.

6 Q. And one of those employees you
7 referred to is Hailey King, correct?

8 A. Yes.

9 Q. And you told me there was an instance
10 in which Hailey King did not report to work
11 for three days and was not disciplined --

12 A. Yes.

13 Q. -- is that correct?

14 How do you know Ms. King was not
15 disciplined?

16 A. Because her office was right next to
17 mine and she didn't show up. We were -- we
18 were concerned, where is she. We called,
19 tried to call her, couldn't get her.

20 Q. My question was: How do you know
21 that Ms. King was not disciplined?

22 A. Because she didn't show up for work.

23 Q. How do you know she was not
24 disciplined?

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1 A. Because I was told. It's in one of
2 the emails. I mean, she -- I can't, I can't
3 remember why, how I know, but I know that
4 she wasn't.

5 Q. Do you know if Dr. Wu or anyone else
6 had a conversation with her about it?

7 A. I think that they did speak to her,
8 yes.

9 Q. And after that incident, was there
10 any other occasion on which Ms. King did not
11 report to work?

12 A. There was another incident where she
13 didn't report for two days. I did not know
14 about that. The timekeeper told me because
15 she was very upset about what was going on,
16 and she actually resigned as a result.

17 Q. Who was the timekeeper?

18 A. Antoinette Newton.

19 Q. Was Ms. King a union employee?

20 A. I don't know that.

21 Q. Why did Ms. King have to keep her
22 time if she was not a union employee?

23 A. Well, Toni kept a time for everyone
24 in the department. It wasn't like a time

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1 clock. She just...

2 Q. Do you know why Ms. King was absent
3 those two days?

4 A. No, I don't.

5 Q. Do you know if Ms. King had an
6 emergency?

7 A. I don't.

8 Q. Do you know if Ms. King had any FMLA
9 leave?

10 A. No.

11 Q. Do you know if Ms. King had any
12 medical accommodation?

13 A. No, I don't know that.

14 Q. Do you know if Ms. King was
15 disciplined for the time that she did not
16 report for two days?

17 A. I don't know that.

18 - - -

19 (Whereupon, 12/14/11 email,
20 Bates No. TEMPLE UNIVERSITY
21 (R.BRIGGS)-0000327-328, was marked
22 as D Exhibit No. 27 for
23 identification.)

24 - - -

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1 Q. -- once you moved to the tenth floor,
2 you could not see if she was coming late or
3 leaving early, correct?

4 A. No, correct.

5 Q. And do you know what Ms. King's
6 salary was?

7 A. No. I have -- don't.

8 Q. Do you know if Ms. King was paid more
9 than you or less than you?

10 A. I don't know.

11 Q. Do you know what Ms. King's job
12 description was?

13 A. No, I don't know what her job
14 description was.

15 Q. Did you ever review Ms. King's job
16 description?

17 A. No.

18 Q. Did you -- strike that.
19 Ms. King is also a woman, correct?

20 A. Yes.

21 Q. Any other way in which you believe
22 Ms. King was treated better than you by
23 Dr. Wu?

24 A. No.

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1 Q. So, I believe the court reporter gave
2 you a document marked as D-27.

3 A. Uh-huh.

4 Q. Have you seen this email before?

5 A. Uh-huh.

6 Q. Is that a "yes"?

7 A. Yes. I'm sorry. "Yes."

8 Q. And is this an email from you to
9 Mr. Wacker and Mr. DiMeo?

10 A. Yes.

11 Q. And have you seen this document
12 before? I think you just said "yes."

13 A. Yes.

14 Q. If you go down to the third to last
15 paragraph.

16 A. Uh-huh.

17 Q. You write, "I am wondering how it is
18 that I can be disciplined for violations and
19 others in the office come and go as they
20 please, violate policies about student
21 records and Social Security numbers, with no
22 consequences at all."

23 A. Uh-huh.

24 Q. Do you see that?

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1 A. Yes, I do.

2 Q. Did you ever violate policies about
3 student records or Social Security numbers?

4 A. I didn't, no.

5 Q. Were you disciplined for any
6 violations other than those that we reviewed
7 today?

8 A. The, the --

9 Q. So today we reviewed some
10 disciplinary actions, correct?

11 A. Yes.

12 Q. Did you receive any disciplinary
13 actions other than the disciplinary actions
14 we reviewed today?

15 A. No.

16 - - -

17 (Whereupon, Plaintiff's
18 complaint was marked as D Exhibit
19 No. 28 for identification.)

20 - - -

21 BY MS. FENDELL-SATINSKY:

22 Q. Ms. Briggs, have you seen this
23 document before?

24 A. Yes, I have.

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1 other way in which you believe Dr. Wu
2 retaliated against you?

3 A. No.

4 - - -

5 (Whereupon, 8/2/12 email
6 string regarding scheduling a
7 meeting, Bates No. TEMPLE UNIVERSITY
8 (R.BRIGGS)-0000210-212 and 2098, was
9 marked as D Exhibit No. 29 for
10 identification.)

11 - - -

12 BY MS. FENDELL-SATINSKY:

13 Q. Ms. Briggs, this document is marked
14 as Exhibit D-29. The Bates numbers are 210,
15 211, 212, and then 208 --

16 A. Uh-huh.

17 Q. -- is the last one.

18 Do you see that?

19 A. 208, yes.

20 Q. Okay. Have you seen these emails
21 before?

22 A. Yes, I have.

23 Q. So I want to start on 211, please.

24 A. Okay.

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